



**Fox Rothschild** LLP  
ATTORNEYS AT LAW

Citizens Bank Center, Suite 1300  
919 North Market Street  
P.O. Box 2323  
Wilmington, DE 19899-2323  
Tel 302.654.7444 Fax 302.656.8920  
www.foxrothschild.com

Sophia Siddiqui  
Direct Dial: (302) 622-4278  
Email Address: ssiddiqui@foxrothschild.com

October 24, 2007

**VIA ELECTRONIC FILING**

The Honorable Mary Pat Thyng  
U.S. District Court for the District of Delaware  
844 King Street  
Wilmington, Delaware 19899

**Re: Joe Gano v. Donald Mark Ehart and Spread Eagle, Inc.  
Delaware District Court, C.A. No. 07-271-\*\*\***

Dear Magistrate Thyng:

As per your Honor's request, I am writing to update the Court on the parties' attempt to resolve the discovery issue discussed during the Court's status conference in this matter.

Plaintiff's counsel is currently in the process of finalizing a confidentiality agreement with Deputy Attorney General Ralph K. Durstein that would provide Plaintiff with access to the family court records in Defendants Mark Ehart's custody and support proceedings. The confidentiality agreement would require the signature of both Plaintiff's and Defendants' counsel.

At this time, Defendants' counsel has taken the position that these documents are privileged and irrelevant to the instant litigation. Plaintiff's counsel would like to continue working with Deputy Attorney General Durstein to finalize the confidentiality agreement, and further discuss ways to resolve the issue with Defendants' counsel.

Plaintiff's counsel suggests that the parties report back to your Honor within one week regarding the status of their resolution of this issue, unless the Court prefers to speak with the parties at an earlier time.



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I am available at your Honor's convenience to answer any questions.

Respectfully,

*/s/ Sophia Siddiqui (#4914)*

Sophia Siddiqui

cc: Richard Cross, Esquire (via hand delivery)  
Tara M. DiRocco, Esquire (via hand delivery)  
Ralph K. Durstein, Esquire (via hand delivery)  
Todd Nurick, Esquire  
Wendy Rothstein, Esquire